

DOCKET FILE COPY ORIGINAL

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)
)
)
Amendment of Section 73.202(b)) MM Docket No. 99-279
Table of Allotments) RM-9716
FM Broadcast Stations)
(Greeley and Broomfield, Colorado))

To: Chief, Allocations Branch

RECEIVED
OCT 28 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**COMMENTS AND EXPRESSION OF CONTINUING INTEREST
OF CHANCELLOR MEDIA/SHAMROCK RADIO LICENSES L.L.C.**

On April 8, 1999, Chancellor Media/Shamrock Radio Licenses L.L.C.

("Chancellor"), licensee of Station KVOD-FM, Greeley, Colorado, filed a petition asking the Commission to amend the FM Table of Allotments by reallocating Channel 223C1 from Greeley to Broomfield, Colorado (the "Petition"). On September 10, 1999, the Commission released a Notice of Proposed Rule Making (the "NPRM") seeking comments on the Petition, and also requesting a gain and loss study for the proposed reallocation of Channel 223C1. Chancellor hereby submits these comments on the Petition, along with the attached Engineering Statement prepared by the consulting firm of Hatfield & Dawson, which includes a gain and loss study (the "Gain/Loss Study"). Chancellor hereby incorporates the Petition by reference, and expresses its continuing interest in the proposed amendment to the FM Table of Allotments.

As noted in the NPRM, Chancellor's reallocation proposal involves no change of transmitter location. The Petition does, however, propose a change in KVOD-FM's reference coordinates, to comply with the Commission's spacing requirements. The Gain/Loss Study,

which is based on the fully-spaced allotment reference coordinates, reveals that, although the loss area encompasses 4,478 people, 25,889 people would gain a new reception service under the proposal, a net coverage gain of 21,411 people. Furthermore, the loss area would continue to receive service from 41 FM and 8 AM stations after the reallocation, with all but 62 people continuing to receive full-time service from at least five stations.

The Gain/Loss Study further reveals that 19% of the gain area is currently underserved, encompassing 2,214 people. Adoption of Chancellor's reallocation proposal would mean that approximately half of this portion of the gain will receive a fourth full-time service, with the remainder receiving a fifth full-time service, a net gain in service to underserved areas corresponding to 2,152 people.

If the Commission allots Channel 223C1 to Broomfield, Colorado, Chancellor will apply for a construction permit to modify its present license and, upon grant of such permit, promptly construct and operate an FM radio station in Broomfield, Colorado on Channel 223C1. The requested allotment is in the public interest because it would provide a first local aural service to Broomfield while maintaining city-grade coverage for Greeley, and significantly increase the population coverage of Channel 223C1, bringing an additional service to over two thousand people who are currently underserved.


Accordingly, Chancellor respectfully requests that the Commission grant the
Petition and reallocate Channel 223C1 from Greeley to Broomfield, Colorado.

October 28, 1999

Respectfully submitted,

Chancellor Media/Shamrock Radio

Licenses, L.L.C.

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Engineering Statement

An engineering study has been conducted in order to determine the gain and loss areas associated with the proposed reallocation of FM Channel 223C1 from Greeley, Colorado to Broomfield, Colorado.

For the purposes of this study, Channel 223C1 at Broomfield is assumed to be operating with full Class C1 facilities at the fully-spaced allotment site, the coordinates of which are NL 40° 03' 15" x WL 105° 04' 12".¹ Channel 223C1 at Greeley is assumed to be operating with its present licensed facilities.

Population figures listed in this statement have been calculated from the 1990 Census using the "block centroid" method.

The attached map exhibit depicts the extent of the loss and gain areas.²

¹The FM Engineering Database incorrectly lists the fully-spaced allotment site coordinates as NL 40° 03' 15" x WL 104° 04' 12". Hatfield & Dawson notified the database staff of this error via e-mail on September 10, 1999, but no correction has yet been effected.

²In determining reception service provided by FM stations, the area of service circumscribed by the station's 1.0 mV/m signal contour was considered, assuming 1) actual facilities for non-commercial stations operating on reserved channels, 2) maximum facilities for the class of station for stations (other than Class C stations) operating on non-reserved channels, and 3) minimum or existing Class C facilities, whichever is greater, for Class C stations. For clear channel Class A AM stations, the service area was defined by the station's 0.5 mV/m groundwave contour, based on its licensed facilities. For all other classes of full-time AM stations, reception service was defined as that service received within a station's nighttime interference-free contour.

Loss Area

The loss area encompasses 1,972 km² and 4,478 persons. The attached table lists all of the 49 radio stations which will continue to provide full-time service to at least a portion of the loss area. 97% of the loss area will remain well-served, *i.e.*, receiving full-time service from at least five other radio stations. A small area, comprising 63 sq km² and 62 persons, will be left with just 4 full-time services.

The proposed reallocation will not result in the creation of any "white" or "gray" areas.

Gain Area

The gain area encompasses 3,706 km² and 25,889 persons. The attached table lists all of the 55 radio stations which provide full-time service to at least a portion of the gain area. 81% of the gain area (3,013 km²) is already well-served, presently receiving full-time service from at least five other radio stations. The population of the "well-served" portion of the gain area is 23,675 persons.

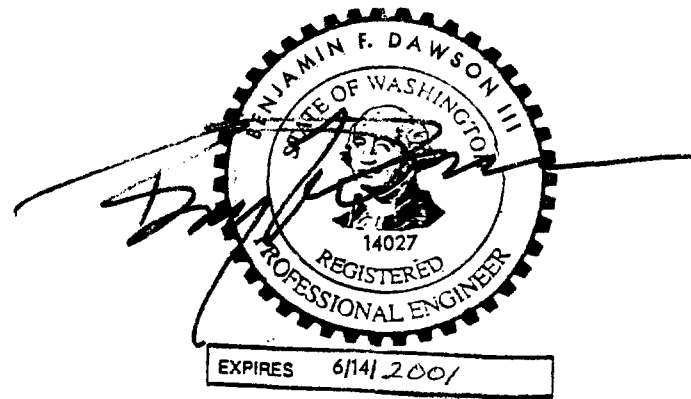
19% of the gain area (693 km²) is currently underserved, *i.e.*, receiving full-time service from fewer than five radio stations. This area has a population of 2214 persons. The proposed reallocation will result in the provision of a fourth full-time service to about half of this area, and the provision of a fifth full-time service to the other half of this area.

The proposed reallocation will not provide service to any existing "white" or "gray" areas.

Certification

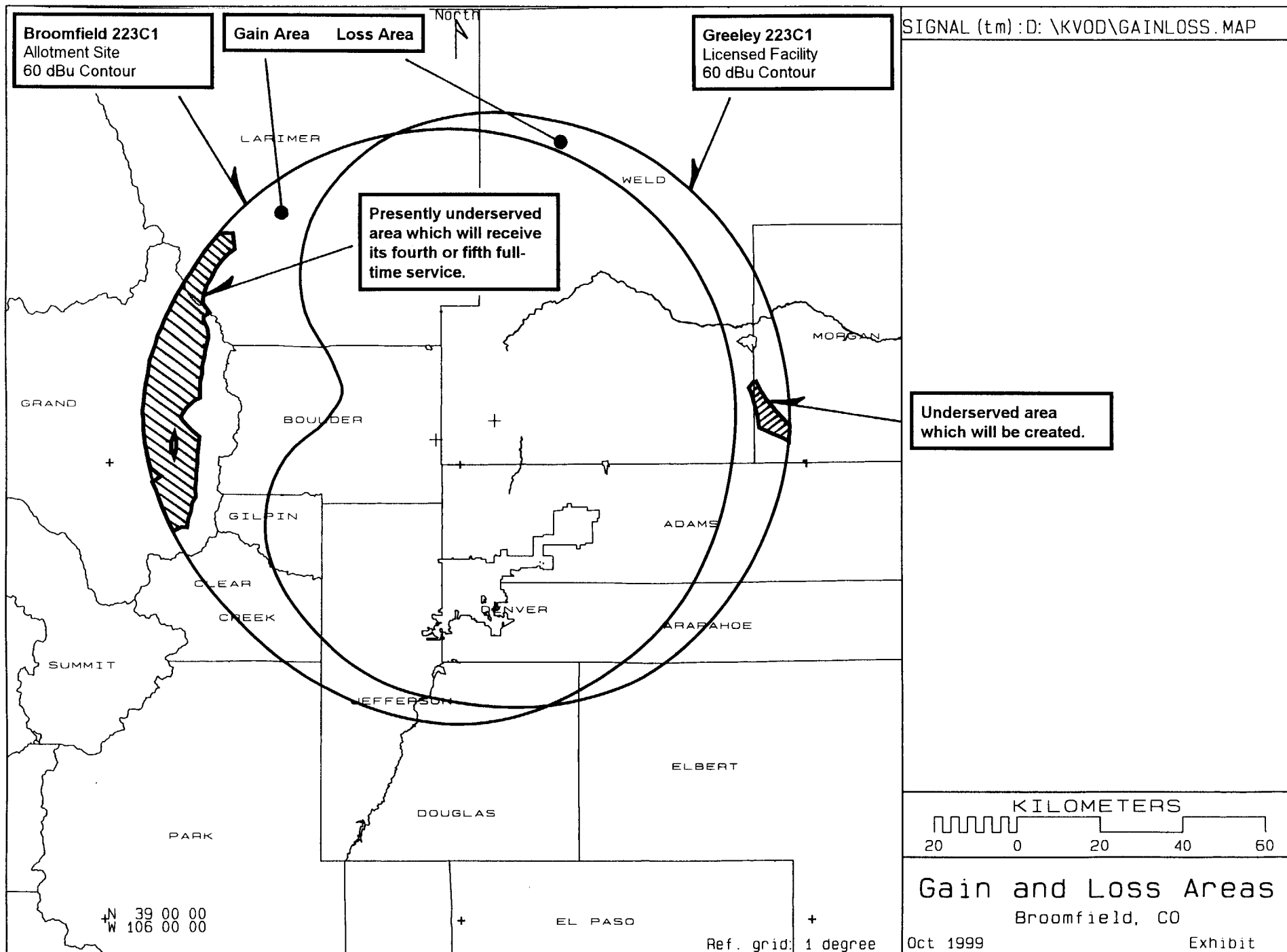
I, Benjamin F. Dawson III, hereby declare that the facts set out in the foregoing Engineering Statement, except those of which official notice may be taken, are true and correct.

Signed this 18th day of October, 1999.



Benj. F. Dawson III, P.E.

Hatfield & Dawson Consulting Engineers



**FM Stations Which Provide 60 dBu Service
To Some Portion of the Loss Area**

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude
KUVO LIC	DENVER CO	BLED851022KD	207C1 89.3	22.5 278.0	39-43-49 105-14-59
KCFR LIC	DENVER CO	BLED851115KB	211C1 90.1	50. 277.0	39-43-49 105-14-59
KCSUFM LIC	FORT COLLINS CO	BLED850124LR	213C3 90.5	10. -108.0	40-36- 0 105- 9-21
KWBI LIC	MORRISON CO	BLED860908KB	216C 91.1	100. DA 356.0	39-36- 0 105-12-35
KUNCFM LIC	GREELEY CO	BLED840203AN	218C1 91.5	100. 174.0	40-38-34 104-49- 8
KJMN LIC	CASTLE ROCK CO	BLH950929KE	221C2 92.1	33. 183.0	39-25-15 104-39-15
KSPZ LIC	COLORADO SPRINGS CO	BLH850207LW	225C 92.9	72. 649.0	38-44-44 104-51-39
KTCL LIC	FORT COLLINS CO	BLH960530KA	227C 93.3	100. DA 344.0	40- 5-47 104-54- 4
KILO LIC	COLORADO SPRINGS CO	BLH940607KA	232C 94.3	83. 643.0	38-44-44 104-51-43
KRKSFM LIC	BOULDER CO	BMLH981009KC	234C 94.7	100. DA 300.0	40- 4-19 105-21-14
KRDOFM LIC	COLORADO SPRINGS CO	BMLH830307AG	236C 95.1	96. 613.0	38-44-47 104-51-37
KHIH LIC	DENVER CO	BMLH850717Z2	239C 95.7	100. DA 490.0	39-43-59 105-14-10
KGLL LIC	GREELEY CO	BMLH920717KA	241C1 96.1	100. 201.0	40-38-34 104-49- 8

Hatfield & Dawson Consulting Engineers

**FM Stations Which Provide 60 dBu Service
To Some Portion of the Loss Area
(Continued)**

KXPK LIC	EVERGREEN CO BLH940701KC	243C 96.5	100. 530.0		39-40-35 105-29- 9
KCCY LIC	PUEBLO CO BLH940217KC	245C 96.9	72. 695.0		38-44-43 104-51-41
KBCOFM LIC	BOULDER CO BMLH960506KA	247C 97.3	100. 469.0	DA	39-54-48 105-17-32
KIGN LIC	CHEYENNE WY BLH800229AD	250C1 97.9	100. 165.0		41- 6- 1 105- 0-23
KKFM LIC	COLORADO SPRINGS CO BLH940321KC	251C 98.1	71. 698.0		38-44-36 104-51-44
KYGOFM LIC	DENVER CO BLH880420KA	253C 98.5	100. 555.0		39-40-35 105-29- 9
KKMG LIC	PUEBLO CO BLH951005KA	255C 98.9	72. 695.0		38-44-43 104-51-41
KUADFM LIC	WINDSOR CO BLH981116KF	256C1 99.1	100. 212.0		40-38-31 104-49- 3
KKHK LIC	DENVER CO BLH960415KJ	258C 99.5	100 495.0	DA	39-43-45 105-14- 6
KVUU LIC	PUEBLO CO BLH6881	260C 99.9	75 610.0		38-44-47 104-51-37
KIMN LIC	DENVER CO BLH960205KA	262C 100.3	100. 345.0	DA	39-40-18 105-13-12
KOLZ LIC	CHEYENNE WY BLH790806AO	264C1 100.7	100. 149.0		41- 6- 1 105- 0-23
KGFT LIC	PUEBLO CO BLH940506KZ	264C 100.7	78.0 676.0	DA	38-44-44 104-51-39
KOSI LIC	DENVER CO BMLH960415KK	266C 101.1	100. 495.0	DA	39-43-45 105-14- 6

Hatfield & Dawson Consulting Engineers

**FM Stations Which Provide 60 dBu Service
To Some Portion of the Loss Area
(Continued)**

KBRUFM LIC	FORT MORGAN CO BLH3983	269A 101.7	3.00 41.0	40-15-31 103-51- 7
KMUSFM LIC	BURNS WY BMLH950920KD	270C2 101.9	50. 150.0	41- 7- 1 104-40- 7
KKCSFM LIC	COLORADO SPRINGS CO BLH960111KJ	270C 101.9	72. 695.0	38-44-43 104-51-41
KAGM LIC	STRASBURG CO BLH960926KD	272A 102.3	6.0 100.0	39-36-23 104-19-42
KTRR LIC	LOVELAND CO BLH880713KA	273C2 102.5	50. DA 125.0	40-27-19 104-55-25
KBIQ LIC	MANITOU SPRINGS CO BLH960503KA	274C 102.7	72. 695.0	38-44-43 104-51-41
KRFX LIC	DENVER CO BLH4823	278C 103.5	100. 320.0	39-43-50 105-14- 7
KCKK LIC	LONGMONT CO BLH920619KA	282C1 104.3	58. DA 367.0	40- 5-47 104-54- 4
KXKLFM LIC	DENVER CO BLH901023KB	286C 105.1	100. 356.0	39-36- 0 105-12-35
KALC LIC	DENVER CO BMLH860130KC	290C 105.9	100. DA 448.0	39-43-59 105-14-12
KBPI LIC	DENVER CO BLH851120KC	294C 106.7	100. 301.0	39-43-59 105-14-12
KSIRFM LIC	BRUSH CO BLH950915KB	296C1 107.1	100. 265.0	40-16-24 104- 6-16
KQKS LIC	LAKEWOOD CO BMLH860418KJ	298C 107.5	100. 365.0	39-41-45 105- 9-54
KPAW LIC	FORT COLLINS CO BLH6757	300C1 107.9	100. 143.0	40-40-50 104-56-32

**AM Stations Which Provide
Interference-Free Service
To Some Portion of the Loss Area**

Call Status	City St Co	FCC File No.	Freq Mode	Power(kW) Hours	Latitude Longitude
KLZ	DENVER		560	5.000	N 39-50-36
LIC	CO US		DA1	UNL	W 104-57-14
2.3 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR					
KIIX	WELLINGTON		600	0.500	N 40-39-00
LIC	CO US	BL19850919AC	DA2	NITE	W 105-02-51
11.6 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR					
KHOW	DENVER		630	5.000	N 39-54-36
LIC	CO US	BL19821123AE	DA2	NITE	W 104-54-50
2.2 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR					
KNUS	DENVER		710	5.000	N 39-57-19
LIC	CO US	BL 6044	DA1	UNL	W 104-51-01
4.5 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR					
KOA	DENVER		850	50.000	N 39-30-22
LIC	CO US		ND1	UNL	W 104-45-57
CLASS A STATION: 0.5 MV/M CONTOUR					
KPOF	DENVER		910	1.000	N 39-50-47
LIC	CO US	BL19800221AC	ND1	NITE	W 105-01-59
2.3 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR					
KKFN	DENVER		950	5.000	N 39-52-30
LIC	CO US		DA1	UNL	W 104-56-00
3.1 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR					
KCOL	FORT COLLINS		1410	1.000	N 40-35-34
LIC	CO US		DAN	NITE	W 105-06-18
8.4 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR					

**FM Stations Which Provide 60 dBu Service
To Some Portion of the Gain Area**

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude
KCME LIC	MANITOU SPRINGS CO	BLED990203KA	204C1 88.7	12.0 668.0	38-44-40 104-51-41
KUVO LIC	DENVER CO	BLED851022KD	207C1 89.3	22.5 278.0	39-43-49 105-14-59
KCFR LIC	DENVER CO	BLED851115KB	211C1 90.1	50. 277.0	39-43-49 105-14-59
KCSUFM LIC	FORT COLLINS CO	BLED850124LR	213C3 90.5	10. -108.0	40-36- 0 105- 9-21
KTLF LIC	COLORADO SPRINGS CO	BLED981009KB	213C 90.5	13.0 665.0	38-44-43 104-51-39
KWBI LIC	MORRISON CO	BLED860908KB	216C 91.1	100. DA 356.0	39-36- 0 105-12-35
KUNCFM LIC	GREELEY CO	BLED840203AN	218C1 91.5	100. 174.0	40-38-34 104-49- 8
KJMN LIC	CASTLE ROCK CO	BLH950929KE	221C2 92.1	33. 183.0	39-25-15 104-39-15
KSPZ LIC	COLORADO SPRINGS CO	BLH850207LW	225C 92.9	72. 649.0	38-44-44 104-51-39
KTCL LIC	FORT COLLINS CO	BLH960530KA	227C 93.3	100. DA 344.0	40- 5-47 104-54- 4
KILO LIC	COLORADO SPRINGS CO	BLH940607KA	232C 94.3	83. 643.0	38-44-44 104-51-43
KRKSFM LIC	BOULDER CO	BMLH981009KC	234C 94.7	100. DA 300.0	40- 4-19 105-21-14
KRDOFM LIC	COLORADO SPRINGS CO	BMLH830307AG	236C 95.1	96. 613.0	38-44-47 104-51-37

**FM Stations Which Provide 60 dBu Service
To Some Portion of the Gain Area
(Continued)**

KHIH LIC	DENVER CO BMLH850717Z2	239C 95.7	100. DA 490.0	39-43-59 105-14-10
KGLL LIC	GREELEY CO BMLH920717KA	241C1 96.1	100. 201.0	40-38-34 104-49- 8
KXPK LIC	EVERGREEN CO BLH940701KC	243C 96.5	100. 530.0	39-40-35 105-29- 9
KCCY LIC	PUEBLO CO BLH940217KC	245C 96.9	72. 695.0	38-44-43 104-51-41
KBCOFM LIC	BOULDER CO BMLH960506KA	247C 97.3	100. DA 469.0	39-54-48 105-17-32
KIGN LIC	CHEYENNE WY BLH800229AD	250C1 97.9	100. 165.0	41- 6- 1 105- 0-23
KKFM LIC	COLORADO SPRINGS CO BLH940321KC	251C 98.1	71. 698.0	38-44-36 104-51-44
KYGOFM LIC	DENVER CO BLH880420KA	253C 98.5	100. 555.0	39-40-35 105-29- 9
KKMG LIC	PUEBLO CO BLH951005KA	255C 98.9	72. 695.0	38-44-43 104-51-41
KUADFM LIC	WINDSOR CO BLH981116KF	256C1 99.1	100. 212.0	40-38-31 104-49- 3
KKHK LIC	DENVER CO BLH960415KJ	258C 99.5	100 DA 495.0	39-43-45 105-14- 6
KVUU LIC	PUEBLO CO BLH6881	260C 99.9	75 610.0	38-44-47 104-51-37
KIMN LIC	DENVER CO BLH960205KA	262C 100.3	100. DA 345.0	39-40-18 105-13-12
KOLZ LIC	CHEYENNE WY BLH790806A0	264C1 100.7	100. 149.0	41- 6- 1 105- 0-23

**FM Stations Which Provide 60 dBu Service
To Some Portion of the Gain Area
(Continued)**

KGFT LIC	PUEBLO CO BLH940506KZ	264C 100.7	78.0 DA 676.0	38-44-44 104-51-39
KOSI LIC	DENVER CO BMLH960415KK	266C 101.1	100. DA 495.0	39-43-45 105-14- 6
KKCSFM LIC	COLORADO SPRINGS CO BLH960111KJ	270C 101.9	72. 695.0	38-44-43 104-51-41
KRKI LIC	ESTES PARK CO BLH980417KB	271A 102.1	6.0 -93.0	40-20-43 105-33- 6
KSMT LIC	BRECKENRIDGE CO BLH6825	272A 102.3	3.00 -70.0	39-29-44 106- 1-44
KTRR LIC	LOVELAND CO BLH880713KA	273C2 102.5	50. DA 125.0	40-27-19 104-55-25
KBIQ LIC	MANITOU SPRINGS CO BLH960503KA	274C 102.7	72. 695.0	38-44-43 104-51-41
KRFX LIC	DENVER CO BLH4823	278C 103.5	100. 320.0	39-43-50 105-14- 7
KCKK LIC	LONGMONT CO BLH920619KA	282C1 104.3	58. DA 367.0	40- 5-47 104-54- 4
KSKEFM LIC	VAIL CO BLH990204KB	284C1 104.7	100. 102.0	39-38- 5 106-26-47
KXKLFM LIC	DENVER CO BLH901023KB	286C 105.1	100. 356.0	39-36- 0 105-12-35
KALC LIC	DENVER CO BMLH860130KC	290C 105.9	100. DA 448.0	39-43-59 105-14-12
KBPI LIC	DENVER CO BLH851120KC	294C 106.7	100. 301.0	39-43-59 105-14-12
KQKS LIC	LAKEWOOD CO BMLH860418KJ	298C 107.5	100. 365.0	39-41-45 105- 9-54

**FM Stations Which Provide 60 dBu Service
To Some Portion of the Gain Area
(Continued)**

KPAW	FORT COLLINS	300C1	100.	40-40-50
LIC	CO BLH6757	107.9	143.0	104-56-32

**AM Stations Which Provide
Interference-Free Service
To Some Portion of the Gain Area**

Call Status	City St Co	FCC File No.	Freq Mode	Power(kw) Hours	Latitude Longitude
KLZ LIC	DENVER CO US		560 DA1	5.000 UNL	N 39-50-36 W 104-57-14
2.3 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR					
KHOW LIC	DENVER CO US	BL19821123AE	630 DA2	5.000 NITE	N 39-54-36 W 104-54-50
2.2 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR					
KNUS LIC	DENVER CO US	BL 6044	710 DA1	5.000 UNL	N 39-57-19 W 104-51-01
4.5 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR					
KTLK LIC	THORNTON CO US	BL19870515AB	760 DA2	1.000 NITE	N 40-00-33 W 104-56-21
6.5 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR					
KOA LIC	DENVER CO US		850 ND1	50.000 UNL	N 39-30-22 W 104-45-57
CLASS A STATION: 0.5 MV/M CONTOUR					
KPOF LIC	DENVER CO US	BL19800221AC	910 ND1	1.000 NITE	N 39-50-47 W 105-01-59
2.3 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR					
KRKY LIC	GRANBY CO US		930 ND1	0.121 NITE	N 40-02-26 W 105-56-11
6.7 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR					
KKFN LIC	DENVER CO US		950 DA1	5.000 UNL	N 39-52-30 W 104-56-00
3.1 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR					
KVOD LIC	DENVER CO US		1280 DA2	5.000 NITE	N 39-36-05 W 104-58-49
4.6 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR					

**AM Stations Which Provide
Interference-Free Service
To Some Portion of the Gain Area
(Continued)**

KEZW AURORA 1430 5.000 N 39-33-47
 LIC CO US BL19800609AC DAN NITE W 104-55-46
 6.4 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR

KEZZ ESTES PARK 1470 0.053 N 40-20-15
 LIC CO US ND1 NITE W 105-31-36
 7.8 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR

KDKO LITTLETON 1510 1.300 N 39-33-08
 LIC CO US BL19840824AD DA2 NITE W 105-02-00
 5.5 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR

KYGO LAKEWOOD 1600 5.000 N 39-39-20
 LIC CO US BL19840223AB DAN NITE W 105-04-28
 9.6 MV/M NIGHTTIME INTERFERENCE FREE CONTOUR